

February 28, 2012

Via ECFS

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Re: Annual 47 C.F.R. S: 64.2009(e) CPNI Certification; EB Docket 06-36
Annual 64.2009(e) CPNI Certification for 2011
Date filed: February 28, 2012
Name of Company covered by this certification: **CallTower, Inc** and
affiliates
Form 499 Filer ID: **823246**
Name of signatory: **Bret England**
Title of signatory: **EVP, CFO & Secretary**

Dear Ms. Dortch:

I, **Bret England**, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's Customer Proprietary Network Information ("CPNI") rules located at 47 C.F.R. §64.2001 et seq.

Attached to this certification is a compliance statement explaining how the company's procedures ensure that it is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by at either state commissions, the court system, or at the Commission against data brokers in the past year. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

If any further information is required, please contact me or our regulatory counsel Kristopher Twomey at 202 681-1850 or by email at kris@lokt.net.

Sincerely,


Bret England
EVP, CFO & Secretary
CallTower, Inc

CPNI Compliance Statement and Operating Procedures of **CallTower, Inc.**

Pursuant to the requirements contained in *Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information; IP-Enabled Services*, CC Docket No. 96-115; WC Docket No. 04-36, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 6927 (2007)(“EPIC CPNI Order”),¹ **Bret England, EVP, CFO & Secretary, of CallTower, Inc.** and affiliated entities makes the following statement:

CallTower, Inc. has established policies and procedures to comply with the Federal Communications Commission's (“FCC”) rules regarding the use, disclosure, and access to section 64.2001 et seq. of the Commission's rules, 47 C.F.R. § 64.2001 et seq. These procedures ensure that **CallTower, Inc.** is compliant with the FCC’s customer proprietary network information (CPNI) rules. The purpose of this statement is to summarize **CallTower, Inc.’s** policies and procedures designed to safeguard CPNI.

CallTower, Inc. has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. **CallTower, Inc.** is engaged in training their personnel as to when they are and are not authorized to use CPNI, and **CallTower, Inc.** has an express disciplinary process in place.

CallTower, Inc. uses CPNI for the limited purposes of initiating, rendering, billing, and collecting for telecommunications services, and may use CPNI, if necessary, to protect its property rights. **CallTower, Inc.** does not disclose CPNI or permit access to such CPNI to any third parties other than as necessary to provide service. **CallTower, Inc.** has established a supervisory review process regarding its compliance with the CPNI rules regarding outbound marketing situations and maintains records for one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

CallTower, Inc. has established procedures to verify an incoming caller's identity. **CallTower, Inc.** trains its personnel in both the use of CPNI, and protection of its confidentiality. These procedures are detailed in **CallTower, Inc.’s** CPNI Manual. **CallTower, Inc.** also limits the number of employees that have access to customer information and call data.

CallTower, Inc. has implemented measures to discover and to protect against unauthorized attempts to access CPNI. **CallTower, Inc.** also has implemented

¹ 47 C.F.R. S: 64.2009(e) states: “A telecommunications carrier must have an officer, as an agent of the carrier, sign and file with the Commission a compliance certificate on an annual basis. The officer must state in the certification that he or she has personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certification explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart. In addition, the carrier must include an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. This filing must be made annually with the Enforcement Bureau on or before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year.”

procedures pursuant to which it can track breaches of CPNI, and given such an event will notify the United States Secret Service and the Federal Bureau of Investigation in accordance with the FCC's rules. **CallTower, Inc.** will track customer complaints regarding CPNI, notify its customers in accordance with the FCC's rules and will maintain a record of notifications to the USSS, FBI, for the time period specified in the FCC's rules.

CallTower, Inc. has not taken any actions (proceedings instituted or petitions filed at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Pretexters have not attempted to access **CallTower, Inc.**'s CPNI. There have been no customer complaints received in the past year concerning the unauthorized release of CPNI.

CallTower, Inc. annually submits a CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that it has implemented to safeguard CPNI.



Bret England

EVP, CFO & Secretary

A decorative graphic on the right side of the page. It features three sets of concentric circles in shades of blue. The top set is the largest, the middle set is medium-sized, and the bottom set is the smallest. Thin blue lines extend from the top-left and top-right towards the circles, and a thicker line extends from the bottom-right towards the largest circle.

Client Support Plan

This document outlines the CallTower Client Services Support (CSS) Plan, specifying how to contact CSS, the case management process, and the Service Level Agreements (SLAs) used to provide the highest quality support for all CallTower services.

CallTower, Inc.
10/5/2011



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Abstract

This document represents the CallTower *Client Services Support* (CSS) Plan, outlining how to contact CSS and conveying information on the CSS case management process and service level agreements (SLAs). Our goal is to provide the highest quality support for all CallTower services.

Overview

CallTower CSS provides support for all CallTower services.

This document provides information on the following:

1. Phone Support options
2. Reporting and coordination of service needs and/or issues via customer main points of contact (MPOCs)
3. Self Administration
4. Issue priorities
5. Formal response times to issues (i.e., SLAs)
6. Maintenance Windows
7. Billing Information
8. Reporting Information
9. Escalation procedures and contacts

Note: To provide optimal support and necessary authorization for service requests, all customer issues will be reported through customer designated main points of contact (MPOCs). Issue resolution will be coordinated between MPOCs and end-users as appropriate.

CallTower *Client Services Support* (CSS) Information

Basic contact and escalation information for CallTower CSS

- Email: support@calltower.com
- Phone support: (866) 586-4700 or (415) 869-8999 - 24x7x365
- Customer Support Portal: <http://support.calltower.com> (See the [Quick Reference Guide](#) for instructions on using the portal)

Important reminder: always call our Support line (866-586-4700) for needs requiring immediate attention or escalation (e.g., any service impairment). Submission of, or updates to, support cases via email or the new online portal will be given standard prioritization.



Phone Support

We have streamlined our phone menu to go directly to a Client Support Services agent without having to select a menu option.

Main Points of Contact

The customer will designate main points of contact (MPOCs) who are authorized to initiate support tickets with CallTower CSS. All end user issues or service requests will be reported first to the customer MPOCs, who will then submit support tickets with CSS after basic first level vetting/filtering as appropriate. Customers are to provide CallTower with a list of MPOCs by name, title, and current contact information,

To provide customer security, customers must also establish a pass code to be used for MPOC authentication on any phone request made to CallTower CSS. Please do not enter the pass code on emailed Support requests since known email addresses for MPOCs suffice for MPOC authentication (and to avoid inadvertent sharing of pass codes with unauthorized individuals who may be copied on support-related emails). A pass code may be any alphanumeric string (e.g., a word, short phrase, or number). If there are multiple MPOCs, please designate which is primary and which is/are secondary.

The customer will also provide CallTower CSS with their internal 'escalation list' containing escalation points of contact within the customer organization for CallTower to use in the event it requires higher level support/interaction pertaining to a support issue.

Reasons that all issues should be reported through customer designated MPOCs:

- Ensures that support ticket requests have the proper authority to be acted on.
- Provides the customer with necessary insight into end-user issues and service usage.
- Builds increasing internal knowledge for the customer on the CallTower solution for all types of support tickets which promotes greater self-sufficiency and increased communication effectiveness with CallTower.
- Facilitates a consistent internal issue reporting process and set of contacts for end-users, reducing confusion and frustration associated with reporting issues.
- Provides an appropriate vetting/filtering mechanism for CallTower CSS to help ensure that the customer's designated CallTower support team is able to focus on and provide the quickest turn-around on real service issues (vs. perceived issues, basic training issues, customer-internal networking issues, or non-issues).



Self Administration

CallTower continues to encourage the use of self administration (i.e., self-provisioning) by organization administrators and MPOCs. We are able to assist you at any time with self-administration of your organization using the Client Provisioning system.

There are many tasks that can be taken care of quickly and efficiently by customers on their own without having to contact or wait on CallTower CSS – a few of which include:

- Password resets
- User creation and deletion
- Updating of user information
- Phone creation and deletion

Ticket Priority Definition

Priority Level	Definition	Example	Case Handling
Priority 1g	Severe business impact, determined by CallTower Engineers to be affecting – Multiple organizations affected	DS3 Carrier outage that is providing service to multiple organizations	Continuous monitoring of services reveals these issues. Immediate and continuous attention. Master tickets are created and all tickets are linked.
Priority 1	Severe business impact due to heavy or total impairment of voice and/or data solution – Single organization affected	All phones are not registered	A live handoff to a technical support representative for immediate assistance. Immediate and continuous attention.
Priority 2	Serious business impact due to partial impairment of voice / data or CallTower provided service – Multiple users affected	An outbound dialing problem that is business affecting	A live handoff to technical support representative for immediate work on the issue.
Priority 3	CallTower service not working for single user and issues that are not AMCs	eFax not working or not able to access voicemail	Case will be assigned to next available representative and customer will be contacted within 1 hour of case creation.
Priority 4	AMCs (Add, Move, and/or Change) Training, and Request for Information	Addition of a new user. Requests for information.	Case will be assigned to a representative and will be resolved within 2 business days. Case open email will be sent upon receipt.



Ticket Management Policy

CSS will use the following guidelines for providing updates unless an alternate agreement is requested by the customer. If the status is not anticipated to change, and providing the same information will delay work on the issue, then CallTower will work to provide an estimated time of resolution (ETR) rather than continuing to provide scheduled updates. Reasons for outage (RFOs) will be provided for any service interruption upon customer request. For issues that stem from our carrier's and Local exchange carriers (LECs) RFOs may be requested of them but are not usually provided.

- **Priority 3** – Updates will be provided daily
- **Priority 2** – Update will be provided hourly
- **Priority 1** – Thirty minute updates by email or phone

Ticket Status Definitions

- **New Case** – the case has not yet been picked up or worked on by an agent.
- **In-Progress** – an agent is actively working on the ticket.
- **Escalated** – the case requires assistance from another department within CallTower.
- **On Hold** – the case is still open but is on hold.
- **Waiting for Details** – the agent requires more information from the customer in order to progress the case.
- **Researching** – the agent is researching the issue.
- **Customer Re-opened** – the case was closed, however, the customer has replied to an email related to the case or requested the case be re-opened.
- **Closed – no response** – Aging cases with no response from the customer will be closed.
- **Closed** – the agent has completed all of the work for the ticket and has tested the implementation.



Maintenance Windows

CallTower's technical personnel perform routine maintenance on CallTower backend systems to ensure the highest level of performance and reliability. The CallTower Client Support Plan defines two types of system maintenance: Monthly Scheduled Maintenance and Unscheduled Maintenance. Each maintenance type is defined as follows:

Monthly Scheduled Maintenance

CallTower performs proactive, routine maintenance each month to ensure the highest level of uptime and performance for CallTower customers. Tasks performed during monthly scheduled maintenance include, but are not limited to, system patching, hardware commissioning and decommissioning, and hardware and software upgrades.

Clients will be notified via e-mail of all monthly scheduled maintenance with at least two weeks advance notice. Notifications will include the following details regarding the monthly scheduled maintenance: date/time details, CallTower products affected by the maintenance event, a brief description of the work to be performed and a brief justification for the work to be performed.

Scheduled monthly maintenance events may be followed by a more detailed notification of added features and functionality provided to CallTower customers as a result of the work performed during the maintenance event.

Unscheduled Maintenance

CallTower performs unscheduled maintenance on an as needed basis. Unscheduled maintenance is maintenance deemed too critical in nature to wait for the monthly scheduled maintenance cycle. Tasks performed during unscheduled maintenance include, but is not limited to, applying patches to fix critical functional and security bugs and necessary hardware replacement.

CallTower will always make every effort to perform the needed unscheduled maintenance outside of the hours of 4:00 a.m. to 10:00 p.m. Pacific Time. However, CallTower reserves the right to perform unscheduled maintenance at any time depending on the nature and urgency of the tasks to be performed.

Customers will be notified via e-mail regarding unscheduled maintenance as soon as possible with as much advance notice as possible. In some cases, notification prior to work being performed may not be possible. Notifications will include the following details regarding the unscheduled maintenance: date/time details, CallTower products affected by the maintenance event, a brief description of the work to be performed and a brief justification for the work to be performed.



CallTower Billing

CallTower's online **e-bill** system provides customers with full-time web access to their last six months of billing statements and full billing detail. Customers are able to access their latest invoice via the web on the afternoon of the 27th of every month by logging in to the MyCallTower Portal, navigating to the Administration tab, and clicking on the e-bill button. Alternatively, e-bill can be accessed directly at <https://www.myebill.com/index.asp?startnwc>. For login credentials or questions related to accessing or using e-bill, please contact the CallTower Billing Department at billing@calltower.com or (866)586-4700.

In addition to e-bill, an email with a PDF of the invoice will be sent directly to a designated financial point of contact and/or the main point of contact on the 27th of each month.



Client Services Escalation List

1st Level	
CallTower Support	Phone: (866) 586-4700 Email: support@calltower.com Phone: (415) 869-8999
2nd Level	
Technical Account Manager – Jessica Lamb	Office: (801) 326-4469 Email: jlamb@calltower.com Cell: (801) 949-6697
3rd Level	
Support Services Manager – Colleen Burns	Office: (801) 783-2201 Email: cburns@calltower.com Cell: (801) 835-2234
4th Level	
Director Client Product and Services – Todd Layton	Office: (801) 872-5438 Email: tlayton@calltower.com Cell: (801) 473-9351
5th Level	
CEO CallTower Division – Bret England	Office: (415) 869-8922 Email: bengland@calltower.com

Other Contacts

Client Advocacy	
Financial – Senior Accountant - Stacy Norvelle	Phone: (415) 869-8952 Email: snorvelle@calltower.com